



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

PT/AAS/DGR
F. #2014R00231

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 16, 2017

By Fedex

All Defense Counsel

Re: United States v. Lilaahar Bical et al.
Criminal Docket No. 16-555 (LDH)

Dear Counsel:

The government hereby makes the following discovery available to you in accordance with Rule 16 of the Federal Rules of Criminal Procedure: a DVD containing a spreadsheet marked BBX-2 and documents Bates-marked BB93366-93370. An updated index to the government's discovery is enclosed with this letter.

The government further provides you notice pursuant to Fed. R. Crim. P. 16(a)(1)(G) and Fed. R. Evid. 702, 703 and 705 that the government intends to call as an expert at trial a witness qualified to discuss the technology used for cellular telephone transmissions. Specifically, the witness will discuss the use of "towers" in various locations to relay such cellular transmissions, and the use of records kept by cellular service providers

to determine the location of a particular cellular telephone at the time of a particular cellular telephone call.

Very truly yours,

BRIDGET M. ROHDE
Acting United States Attorney

By: /s/ Drew G. Rolle
Drew G. Rolle
Paul Tuchmann
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Assistant U.S. Attorneys
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Enclosures

cc: Clerk of the Court (LDH) (by ECF) (without enclosures)